

**David B. Markowitz, OSB #742046**  
DavidMarkowitz@MarkowitzHerbold.com  
**Lauren F. Blaesing, OSB #113305**  
LaurenBlaesing@MarkowitzHerbold.com  
**Anit K. Jindal, OSB #171086**  
AnitJindal@MarkowitzHerbold.com  
MARKOWITZ HERBOLD PC  
1455 SW Broadway, Suite 1900  
Portland, OR 97201  
Tele: (503) 295-3085

*Attorneys for Defendants*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

**WILLAMETTE FAMILY, INC.**, an Oregon  
non-profit corporation,

Case No. 6:22-cv-00978-MK

Plaintiff,

v.

**PATRICK ALLEN**, in his official capacity,  
**DAVID BADEN**, in his official capacity, and  
**FRITZ JENKINS**, in his official capacity,

**DEFENDANTS' UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING  
TO FIRST AMENDED COMPLAINT**

**Fed. R. Civ. P. 6(b)(1)(A)**

Defendants.

**LOCAL RULE 7-1 CERTIFICATION**

The undersigned counsel certifies that the parties conferred regarding the subject of this motion and that on September 22, 2022, counsel for plaintiff Willamette Family, Inc. consented to extend until October 11, 2022 the time for defendants Patrick Allen, David Baden and Fritz Jenkins to answer, plead, or otherwise respond to plaintiff's First Amended Complaint.

**MOTION**

Defendants hereby move for an extension of time to respond to plaintiff's First Amended Complaint, which would extend the deadline from September 30, 2022, to and including October 11, 2022. Mr. Allen and Mr. Baden accepted service on September 12, 2022. Mr. Jenkins accepted service of the First Amended Complaint on September 20, 2022. Defendants do not waive any defenses, including but not limited to the Court's lack of personal jurisdiction over defendants or Eleventh Amendment immunity.

This request is made in good faith and not for the purpose of delay.

DATED this 28<sup>th</sup> day of September, 2022.

MARKOWITZ HERBOLD PC

By: *s/ Anit K. Jindal*

---

David B. Markowitz, OSB #742046  
DavidMarkowitz@MarkowitzHerbold.com  
Lauren F. Blaesing, OSB #113305  
LaurenBlaesing@MarkowitzHerbold.com  
Anit K. Jindal, OSB #171086  
AnitJindal@MarkowitzHerbold.com  
Attorneys for Defendants

1330609